

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

SANDOZ INC. and RAREGEN, LLC

Plaintiffs,

v.

UNITED THERAPEUTICS CORP. and
SMITHS MEDICAL ASD, INC.

Defendants.

Case No. 19-cv-10170-BRM-LHG

**DECLARATION OF MATTHEW K.
WASSERMAN, ESQ., IN SUPPORT
OF RAREGEN, LLC'S
OPPOSITION TO DEFENDANTS'
MOTION FOR SANCTIONS**

I, Matthew K. Wasserman, Esq., declare as follows:

1. I am a member of the bars of the State of Texas and the District of Columbia and an associate with the law firm of Quinn Emanuel Urquhart & Sullivan, LLP ("Quinn Emanuel"), attorneys for RareGen, LLC in the above-captioned matter. I have been admitted to practice *pro hac vice* before this Court in this case. I make this declaration based on my personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.


2. On September 23, I had a discussion with Quinn Emanuel's Managing Clerks Office ("QE MCO") via email requesting assistance using the District of New Jersey's Electronic Case Files ("ECF") system to file Plaintiffs' Motion for a Preliminary Injunction and Supporting Materials, on Friday, October 4, due to the large size of the filing and because materials would need to be filed under seal.

3. On October 1, I had a follow-up discussion via email and phone with Andrew Scott, Quinn Emanuel's Assistant Managing Clerk in the QE MCO, regarding the materials to be filed on October 4, including the District of New Jersey's ECF guidelines and procedures for filing materials under seal.

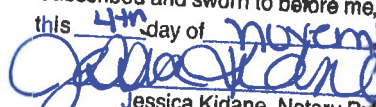
4. On October 3, I had a follow-up discussion via email with Mr. Scott to prepare for the next day's filing. I discussed with Mr. Scott if the QE MCO could download file-stamped versions of Plaintiffs' Motion and Supporting Materials after the QE MCO filed them under seal the next day, along with the filing confirmation pages, and send those materials to the Quinn Emanuel attorneys.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED: November 4, 2019


Matthew K. Wasserman, Esq.



District of Columbia: SS
Subscribed and sworn to before me, in my presence,
this 4th day of November, 2019

Jessica Kidane, Notary Public, D.C.
My commission expires August 31, 2020.